

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

IN RE:) Case No. 16-09485
)
George E. Ludkowski,) Chapter 7
)
Debtor.) Hon. Timothy A. Barnes
) Hearing Date: May 17, 2017
) at 10:00 a.m.

DEBTOR GEORGE LUDKOWSKI'S NOTICE OF MOTION

TO:

U.S. Trustee
Patrick S. Layng
Office of the United States Trustee
Region 11
219 S. Dearborn St., Room 873
Chicago, IL 60604
USTPRegion11.es.ecf@usdoj.gov

N. Neville Reid
Fox Swibel Levin & Carroll, LLP
200 W. Madison Street
Suite 3000
Chicago, IL 60606
nreid@fslc.com

Robert N. Honig
116 S. York St., Ste. 215
Elmhurst, IL 60126
robert@roberthonig.com

Bruce de'Medici
Kelley Kronenberg
190 S. LaSalle St., Ste. 450
Chicago, IL 60603
bdemedici@gmail.com

PLEASE TAKE NOTICE that on May 17, 2017 at 10:00 a.m., the undersigned will appear before the Honorable Judge Timothy A. Barnes at the Dirksen Federal Building, located at 219 S. Dearborn, Courtroom 744, Chicago, Illinois and will then and there present the attached **Debtor George E. Ludkowski's Motion To Convert To Chapter 13**, a copy of which is attached and hereby served upon you.

Debtor George E. Ludkowski,

By: /s/ Kevin P. McJessy

One of His Attorneys

Kevin P. McJessy
McJessy, Ching & Thompson, LLC
Counsel for Debtor
3759 N. Ravenswood, Suite 231
Chicago, Illinois 60613
(773) 880-1260
(773) 880-1265 (fax)
mcjessy@mcandt.com

CERTIFICATE OF SERVICE

I, Kevin P. McJessy, an attorney, certify that I caused the foregoing **Debtor George E. Ludkowski's Notice of Motion** to be served upon:

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via the Court's ECF Filing System on this 11th day of May 2017.

AND UPON

Spokane Financial
c/o David E. Cohen
Fisher Cohen Waldman Shapiro
1247 Waukegan Rd., Ste. 100
Glenview, IL 60025

Chase Card
PO Box 15298
Wilmington, DE 19850

Harris & Harris Ltd.
111 W. Jackson Blvd., Ste. 400
Chicago, IL 60604

Kohls
PO Box 2983
Milwaukee, WI 53201-2983

PNC Bank
PO Box 3180
Pittsburgh, PA 15230

SYNCB/Empire
PO Box 965036
Orlando, FL 32896-5036

via U.S. First Class Mail, postage prepaid, deposited in the United States Mail Depository located at 3759 N. Ravenswood, Chicago, Illinois, 60613 on this 11th day of May 2017.

/s/ Kevin P. McJessy
Kevin P. McJessy

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DEBTOR GEORGE LUDKOWSKI'S MOTION TO CONVERT TO CHAPTER 13

NOW COMES the Debtor, George Ludkowski, by and through his attorney, Kevin McJessy, McJessy Ching & Thompson, LLC, and states to this Honorable Court as follows:

1. The Debtor qualifies as a debtor under Chapter 13 of the Bankruptcy Code, and has not previously converted this case from any other chapter.
2. Under section 706(a) of the Bankruptcy Code, the Debtor is entitled to convert his Chapter 7 case to a case under Chapter 13 at any time, and the Debtor now wishes to convert this Chapter 7 case to a case under Chapter 13.

WHEREFORE, the Debtor moves this Honorable Court to convert this Chapter 7 case to a case under Chapter 13 of the Bankruptcy Code.

Respectfully submitted,

GEORGE LUDKOWSKI,

By: /s/ Kevin P. McJessy
One of His Attorneys

Kevin P. McJessy
McJessy, Ching & Thompson, LLC
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Chicago, Illinois 60613
(773) 880-1260
(773) 880-1265 (fax)
mcjessy@mcandt.com

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